

REMARKS

Claims 61-87 are pending in the instant application. In the most recent Office Action, claims 61-63, 75 and 77-83 are rejected under 35 U.S.C. § 102(b) as allegedly anticipated by U.S. Patent No. 5,696,962 to Kupiec (hereinafter, "Kupiec"). Claims 64-66 and 68-71 are rejected under 35 U.S. C. § 103 as allegedly obvious over Kupiec in view of U.S. Patent No. 6,678,679 to Bradford (hereinafter, "Bradford"). Claim 67 is rejected under 35 U.S.C. § 103 as allegedly obvious over Kupiec in view of Bradford, and further in view of Robertson et al., "Relevance Weighting of Search Terms" (hereinafter, "Roberston"). Claims 72-74 and 84-86 are rejected under 35 U.S.C. § 103 as allegedly obvious over Kupiec in view of U.S. Patent No. 6,070,133 to Brewster (hereinafter, "Brewster"). Claim 76 is rejected under 35 U.S.C. § 103 as allegedly obvious over Kupiec in view of U.S. Patent No. 5,442,778 to Pedersen (hereinafter, "Pedersen"). Claim 87 is rejected under 35 U.S.C. § 103 as allegedly obvious over Kupiec in view of Brewster and Pedersen.

At the outset, Applicant gratefully acknowledges the Examiner's courtesy in conducting a telephone interview held Thursday, 17 November 2005 with Applicant's undersigned representative. This paragraph is offered as a summary of that interview, 37 C.F.R. § 1.133. In the interview, Kupiec was discussed with reference to independent claims 61 and 79, particularly in light of comments at page 3 of the most recent Office Action. The foregoing amendments and following remarks are made in the spirit of those discussions. No specific agreement was reached.

As amended above, independent claims 61 and 79 each recite a method comprising, *inter alia*, generating candidate query transformations for each question type to substitute for the question phrase as a search term. This amendment finds support generally throughout the

original specification as filed, and particularly at, among other places, pp. 11-12. No new matter has been added.

Kupiec does not disclose "generating candidate query transformations for each question type ... From a collection of question phrase-answer pairs". In Kupiec, words of a noun phrase of a user input string, including the head noun (for example, "last Apache warrior chief", Kupiec, column 9, lines 20-28), are replaced by synonyms drawn from a dictionary or thesaurus, and these substitute related words are used to improve the Boolean search query (Kupiec, column 22, line 63 to column 23, line 16).

The Examiner argues that the "result pairs" generated by Kupiec from a query (in the form of a "query" and "appropriate documents containing query answers") should be considered "question-answer" pairs. This distorted interpretation of Kupiec, even if assumed correct, fails to satisfy the rest of the claim language.

As recognized by the Examiner, Kupiec discloses generating "result pairs" by transforming an initial query by a user. This is not what the claim language recites. The claim does not recite that "question-answer" pairs are generated *from* a query. Rather the claim recites that the "candidate query transformations" are generated from the "question-answer pairs". In other words, the claim recites the exact opposite of what the Examiner reads from Kupiec. The question-answer pairs are an "input" to the present disclosed system, not an "output" as interpreted by the Examiner. The present invention requires a collection of question-answer pairs to be pre-specified in some manner. Kupiec has no such notion of generating the query transformation from a pre-specified collection of question-answer pairs.

Moreover, none of Bradford, Robertson, Brewster or Pedersen, taken singly or in any combination with each other or Kupiec, offers any teaching or suggestion to ameliorate the

deficiency of Kupiec relative to the independent claims. Therefore, Applicant respectfully submits that the rejection has been obviated, and kindly requests favorable reconsideration and withdrawal thereof.

Claims 62-78 depend, either directly or indirectly, from independent claim 61, and claims 80-87 depend, either directly or indirectly, from independent claim 79. Therefore, claims 62-78 and 80-87 incorporate novel and non-obvious features of their respective independent base claims. While these dependent claims are each separately patentable, they are offered as patentably distinguishable over the prior art for at least the same reasons as their respective independent base claims. Favorable reconsideration and withdrawal of the rejection of claims 62-78 and 80-87 is kindly requested.

In light of the foregoing, Applicant respectfully submits that all pending claims recite patentable subject matter, and kindly solicits an early and favorable indication of allowability. If the Examiner has any reservation in allowing the claims, and believes a further telephone interview would advance prosecution, he is kindly requested to telephone the undersigned at his earliest convenience.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "David J. Torrente", with a stylized flourish at the end.

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